

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

ANGELO CLARK,

Plaintiff,

V.

REGIONAL MEDICAL FIRST
CORRECTIONAL,
MANAGER ANGELA WILSON, AND
CORRECTIONAL MEDICAL SERVICES,

Defendants.

C. A. No. 06-465 - SLR

TRIAL BY JURY OF
TWELVE DEMANDED

DEFENDANTS CORRECTIONAL MEDICAL SERVICES'
FIRST SET OF REQUEST FOR PRODUCTION OF DOCUMENTS
DIRECTED TO PLAINTIFF

Pursuant to Rule 34 of the Federal District Court Rules of Civil Procedure, you are hereby requested to produce the below listed documents and/or items for purposes of discovery. This material will be examined and/or photocopied; photograph negatives will be processed and photographs reproduced. Said documents and items are to be produced at the offices of Marks, O'Neill, O'Brien & Courtney, P.C., 913 Market Street, Suite 800, Wilmington, Delaware 19801, and supplemented thereafter in accordance with the Rules of Civil Procedure.

If any document required to be produced by this Request is claimed by you to be not discoverable because it is privileged or for any other reason, then each such document should be identified in your Response by date, sender, recipient, persons to whom copies have been furnished, and subject matter, and the basis for the claim of privilege or other reason should be stated in your Response.

REQUESTS

1. Any and all statements, descriptions of statements, summaries of statements, memoranda, records or writing (signed or unsigned) of any and all witnesses, including any statements from the parties herein, or their respective agents, servants or employees, including tapes or other mechanically transcribed information.

RESPONSE:

2. All photographs, recordings, films, charts, sketches, graphs and diagrams taken and/or prepared.

RESPONSE:

3. Any and all reports compiled or prepared by an individual who has been retained as an expert in this matter.

RESPONSE:

4. The names, home and business addresses of all experts contacted.

RESPONSE:

5. All writings, memoranda, date and/or tangible things which related directly or indirectly to the incident and damages set forth in Plaintiff's Complaint.

RESPONSE:

6. Any and all copies of Internal Revenue Service Tax Returns for five full years prior to, and all years subsequent to the date referred to in Plaintiff's Complaint.

RESPONSE:


7. Any and all documents, records, evidence and anything whatsoever which will be introduced at trial for use in direct examination or impeachment.

RESPONSE:

8. Any document or thing the plaintiff has read or referred to in preparation of any pleadings in the instant case.

RESPONSE:

Marks, O'Neill, O'Brien & Courtney, P.C.

By: 
Patrick G. Rock, Esquire (I.D. # 4632)
Megan T. Mantzavinos, Esquire (I.D. # 3802)
913 North Market Street, Suite 800
Wilmington, DE 19801
(302) 658-6538
Attorney for Defendant CMS

DATED: *Jul 31, 2007*

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

ANGELO CLARK,	:	
	:	
Plaintiff,	:	
	:	
v.	:	C. A. No. 06-465 - SLR
	:	
REGIONAL MEDICAL FIRST	:	TRIAL BY JURY OF
CORRECTIONAL,	:	TWELVE DEMANDED
MANAGER ANGELA WILSON, AND	:	
CORRECTIONAL MEDICAL SERVICES,	:	
	:	
Defendants.	:	

NOTICE OF SERVICE

I, Patrick G. Rock, Esquire hereby certify that on this 1st day of August, 2007, two copies of the below-mentioned documents were served by postage pre-paid first class mail upon the following individual:

DOCUMENT:

*DEFENDANT CORRECTIONAL MEDICAL SERVICES' FIRST SET OF INTERROGATORIES
DIRECTED TO PLAINTIFF*

*DEFENDANT CORRECTIONAL MEDICAL SERVICES' FIRST SET OF REQUEST FOR
PRODUCTION OF DOCUMENTS DIRECTED TO PLAINTIFF*

DIRECTED TO:

Inmate Angelo Clark, *Pro Se*
SBI #123209
Delaware Correctional Center
1181 Paddock Road
Smyrna, DE 19977

/s/ Patrick G. Rock, Esquire

Patrick G. Rock, Esquire (4632)
Marks, O'Neill, O'Brien & Courtney, P.C.
913 North Market Street, Suite 800
Wilmington, DE 19801
(302) 658-6538
Attorney for Defendant CMS

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